

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

As requested, the specification and Abstract have been reviewed and amended above so as to put them in more traditional US format.

With respect to consecutive numbering of claims, the preliminary amendment of March 29, 2002 attempted to cure this problem by re-numbering the last claim as claim number 19. The above amendment has tried to obviate the problem by simply indicating a missing claim 19 as a "cancelled" claim. If some other action is desired or required, the Examiner is respectfully requested to telephone the undersigned so that it can be attended to as soon as possible.

The rejection of claim 20 under 35 U.S.C. §101 is respectfully traversed. In view of the above amendment which now positively recites a computer program storage medium having stored thereon a set of instructions, etc., it is believed that this ground of rejection has been mooted.

The rejection of claims 1, 8, 16, 17 and 20 under 35 U.S.C. §102 as allegedly anticipated by Katz '295 is respectfully traversed.

The Examiner has admitted that Katz '295 does not teach the features described in the "characterizing" part of original claim 1. In an attempt to supply this admitted

deficiency of Katz, the Examiner simply argues that among the perhaps infinite number of possible solutions to the "objective technical problem" (how to provide a specifically ordered output of retrieved data entries), the applicant's claimed specific solution in the "characterizing" part of claim 1 is considered, by the Examiner, to be "common background knowledge in the technical field at the filing date".

This sounds more like a rejection based on alleged obviousness than anticipation. Clearly there can be no anticipation of a claim unless a single instance of prior art itself teaches to those of ordinary skill in the art the specific claimed subject matter in all detail (or that such specific detail would have at least have been "inherent" when read by those having ordinary skill in the art at the relevant time).

Here, there is no cited evidence whatsoever to substantiate the Examiner's allegation that the applicant's claimed specific solution to the problem would even be "common background knowledge in the technical field at the filing date" -- let alone that one of only ordinary skill in the art would have found this particular solution to have been "obvious" within the meaning of 35 U.S.C. §103 and relevant case law requiring a competent analysis of "obviousness".

The rejection based on alleged anticipation is clearly erroneous. If the Examiner continues any rejection based on alleged "common knowledge", then it is requested that

such allegation be supported with factual evidence of such in accordance with standard MPEP practice.

The rejection of claims 2-7, 9-15 and 18 under 35 U.S.C. §103 as allegedly being made "obvious" based on Katz in view of Sheth et al. '194 is also respectfully traversed.

Fundamental deficiencies of Katz have already been noted above. Sheth '194 does not even qualify as "prior art" with respect to the present application. In particular, Sheth at best would be entitled to an effective date as "prior art" as of the filing of its provisional parent application on March 15, 2000 (even assuming that such provisional application was co-extensive with what came to be the non-provisional application and issued patent). However, applicant is entitled to a priority date of October 29, 1999. Receipt of a certified copy of applicant's priority document (which is in the English language) is already indicated in the record of this application. As inspection of the certified priority document will reveal, it fully supports all of the applicant's claims in this US national phase proceeding of a prior PCT application.

Accordingly, Sheth '194 does not constitute "prior art" in the present situation and therefore this ground of rejection is clearly erroneous and need not be discussed in further detail.

In an attempt to move this application more quickly toward allowance, independent claims 1 and 8 have been amended above so as to even more particularly and distinctly point out

aspects of the applicant's invention which are believed to be novel and patentable. There is basis for this in the specification as originally filed (see page 22 lines 26-29). Corresponding amendments have also been made to the dependent claims, especially claims 2 and 9 to account for the amendments made to the independent claims.

The claims now emphasize that ordering of the search results is arranged according to a template which determines in which order to place the retrieved results and which is classified to the type of entity to be described.

By storing templates in association with the type of entity to be described (which only makes sense in a system such as that presently claimed in which a query is decoded into semantically meaningful query elements such that the type of entity to be described may be ascertained automatically by the system on the basis of the input query) a method is arrived at by which sophisticated well structured documents which correspond somewhat to a sensible ordering of information for a particular context may be automatically synthesized from a collection of annotated data entries.

None of the prior art documents provides a method or system for permitting this to be achieved, the key technical element required being that of associating an ordering of the data entries which will make up the complete document with the type of entity to be described. This feature is not taught by any of the prior art documents. Furthermore, such an association was not common general knowledge at the applicant's priority date,

even if it was known to modify the ordering of returned search results on the basis of general user preferences or past behavior.

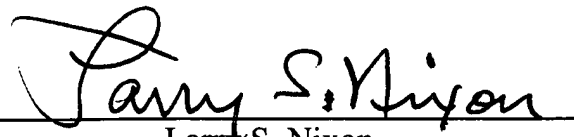
In the applicant's exemplary embodiment, there are a number of different templates and these are stored by "the type of entity to be described" -- i.e. in order to choose which template to select the type of entity to be described is determined and then the correct template is fetched. Each template controls the order in which data entries are displayed to the user, and this is done based on the annotations associated with the data entries to be displayed - i.e., the annotations of each of the data entries to be displayed are checked and matched to a position (in an ordering of the data entries determined by the template -- e.g., the "company" template might specify that for company entities data entries should be displayed in the following order: Company, name; Company, function; Company, Manager; Company, location; whereas the "Person" template might specify that data for person entities should be displayed in the following order: Person, name; Person, age; Person, function; Person, location; etc.).

Accordingly, this entire application is now believed to be in allowable condition and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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